

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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|--|---|----------------------------------|
| IN RE: | : | BANKRUPTCY CASE NO. 17-22045-GLT |
| | : | |
| rue21, inc., <i>et al</i> ¹ , | : | Joint Administration Requested |
| | : | |
| Debtor. | : | CHAPTER 11 |
| | : | |

**NOTICE OF APPEARANCE, REQUEST FOR NOTICE AND
SERVICE OF ALL DOCUMENTS, REQUEST FOR MATRIX ENTRY
AND RESERVATION OF RIGHTS**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Bankruptcy Procedure 9101(b) and section 1109(b) of Title 11 (the “Bankruptcy Code”) of the United States Code, Babst, Calland, Clements & Zomnir, P.C. hereby appears as counsel for **GORDON BROTHERS RETAIL PARTNERS, LLC** (the “Gordon Brothers”), a party-in-interest in the above-captioned debtor’s (the “Debtor”) Chapter 11 case.

PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rules of Bankruptcy Procedure 2002, 9007 and 9010, Local Bankruptcy Rules 2002-2, 9010-2 and sections 342 and 1109(b) of the Bankruptcy Code, Gordon Brothers hereby requests that all documents filed with the Court, all notices given or required to be given in the Debtor’s case, and all papers served or required to be served in this case, be given and served upon the following, and that appropriate entry thereof be made on the Clerk’s Matrix in the case:

David W. Ross, Esquire
dross@babstcalland.com
Erica K. Dausch, Esquire
edausch@babstcalland.com
Babst, Calland, Clements & Zomnir, P.C.
Two Gateway Center, 7th Floor
Pittsburgh, PA 15222
Phone: (412) 394-5400
Fax: (412) 394-6576

PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure and Bankruptcy Code provisions specified above, but also includes, without limitation, all orders, notices hearing dates, applications, motions, petitions, requests, complaints, demands, replies, answers, schedules of assets and liabilities and statements of affairs, operating reports, plans of reorganization and

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: rue21, inc. (1645); Rhodes Holdco, Inc. (6922); r services llc (9425); and rue services corporation (0396). The location of the Debtor’s service address is: 800 Commonwealth Drive, Warrendale, PA 15086.

liquidation and disclosure statements, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, telegraph, telex, facsimile transmission, electronic mail or otherwise that: (a) affect or seek to affect in any way any rights or interests of any creditor or party in interest in this case, including Gordon Brothers, with respect to, without limitation, (i) the Debtor, (ii) property of the estate or proceeds thereof, in which the Debtor may claim an interest, or (iii) property or proceeds thereof, in the possession, custody or control of others, that the Debtor may seek to use; or (b) require or seek to require any act, delivery of any property, payment or other conduct by Gordon Brothers.

PLEASE TAKE FURTHER NOTICE that Gordon Brothers intends that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive: (a) the right of Gordon Brothers to have final orders and non-core matters entered only after de novo review by a District Judge; (b) the right of Gordon Brothers to trial by jury in any proceedings so triable in this case or any case, controversy or proceeding related to this case; (c) the right of Gordon Brothers to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (d) any other rights, claims, actions, defenses, set-offs or recoupments to which Gordon Brothers is or may be entitled.

Dated: May 16, 2017

/s/ Erica K. Dausch

David W. Ross, Esquire

PA ID No. 62202

dross@babstcalland.com

Erica K. Dausch, Esquire

PA ID No. 306829

edausch@babstcalland.com

Babst, Calland, Clements & Zomnir, P.C.

Firm No. 812

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Pittsburgh, PA 15222

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FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : BANKRUPTCY CASE NO. 17-22045-GLT
:
rue21, inc., *et al*², : Joint Administration Requested
:
Debtor. : CHAPTER 11
:
_____ :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Entry of Appearance, Request for Notice and Service of All Documents, Request for Matrix Entry and Reservation of Rights** was served this 16th day of May, 2017, via the CM/ECF system on all interested parties.

Dated: May 16, 2017

/s/ Erica K. Dausch
David W. Ross, Esquire
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